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July 26, 2017

Via ECF Filing

Hon. Mark Falk, U.S.M.J.
U.S. District Court, District of New Jersey
U.S. Post Office and Courthouse
Newark, New Jersey 07101

**Re: Ronald Goldman, Executor of The Estate of Robert Goldman vs. Fidelity
and Guaranty Insurance Underwriters, Inc.
Civil Action No. 17-2745**

Dear Judge Falk:

This firm represents Defendant Fidelity and Guaranty Insurance Underwriters, Inc. ("Fidelity") in connection with the above-referenced matter.

An in-person scheduling conference is scheduled before Your Honor on August 8, 2017 at 11:00 a.m. and the parties are scheduled to submit a Joint Discovery Plan at least 72 hours before the conference. As you will recall, the conference had been rescheduled to August 8th at the request of Plaintiff's counsel, Robert Vort, Esq., due to a pending surgery. I spoke with Mr. Vort briefly today and he advises that he will no longer be practicing law. Gerald H. Litwin, Esq. of Gartenberg Howard is assisting Mr. Vort in the process of winding down his legal practice and referring his cases to new litigation counsel. Accordingly, with the consent of all counsel, we respectfully request that Your Honor adjourn the pending deadlines in order to provide Plaintiff sufficient time to retain new counsel.

Respectfully submitted,



PATRICK A. FLORENTINO

cc: Robert A. Vort, Esq., Counsel of Record for Plaintiff (via E-Mail)
Gerald H. Litwin, Esq., Interim Counsel for Plaintiff (via E-Mail)